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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

(Jointly Administered) Debtors.

NOTICE OF FILING OF THIRTEENTH SUPPLEMENT TO SCHEDULE "1" TO THE MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE

COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION

PLEASE TAKE NOTICE that on December 8, 2014, General Motors LLC filed the attached Thirteenth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York December 8, 2014

Respectfully submitted,

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THIRTEENTH SUPPLEMENT¹ TO SCHEDULE "1"

CHART OF ADDITIONAL IGNITION SWITCH ACTIONS COMMENCED AGAINST NEW GM NOT LISTED IN THE PREVIOUS SUPPLEMENTS TO SCHEDULE "1" TO MOTION TO ENFORCE

	<u>Name</u>	Class Models	Plaintiffs' Model	<u>Court</u>	Filing Date
1	Brochey ²	N/A	2009 Chevy Impala ³	Court of Common Pleas of Erie County Pennsylvania 13108-2014 ⁴	11/7/14

This schedule supplements the previous supplements and the original Schedule "1" previously filed with the Court in connection with the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction* ("Motion to Enforce").

A copy of the complaint filed in the Brochey Action is attached hereto as Exhibit "A."

While the Brochey Action also concerns a 2011 Chevy Camaro, the claims regarding that vehicle do not implicate the Motion to Enforce.

The Brochey Action was removed by New GM to the United States District Court for the Western District of Pennsylvania (No.: 1:14-cv-00304-JFM) on December 3, 2014.